

## **EXHIBIT 7**

BRYAN LEWIS, OCTOBER 15, 2014

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

LINCOLN JONES, JR. AND MUYESSER	)	
NILE JONES, INDIVIDUALLY AND	)	
AS TRUSTEES OF THE LINCOLN AND	)	
M. NILE JONES REVOCABLE TRUST;	)	
AND PROJECT SENTINEL, INC.,	)	
	)	
Plaintiffs,	)	
	)	
	)	CASE NO.
VS.	)	5:13-cv-02390-LHK
	)	
	)	
TRAVELERS CASUALTY INSURANCE	)	
COMPANY OF AMERICA,	)	
	)	
Defendant.	)	
_____	)	

DEPOSITION OF BRYAN LEWIS, taken on behalf  
of the Plaintiffs, at 301 North  
Lake Avenue, Suite 150, Pasadena,  
California, commencing at 10:05 A.M.,  
Wednesday, October 15, 2014, before BARBARA  
A. STAUFFER, C.S.R. No. 12282, pursuant to  
Subpoena.

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10:06:19	1	MR. ALEXANDER: Good morning. Grant
10:06:20	2	Alexander, DLA Piper, representing the witness.
10:06:24	3	THE WITNESS: Bryan Lewis, the witness.
10:06:28	4	THE VIDEOGRAPHER: Your court reporter is
10:06:28	5	Barbara Stauffer. And she will now swear in the
10:06:31	6	witness.
10:06:42	7	THE REPORTER: Please raise your right hand.
10:06:42	8	Do you state under penalty of perjury that the
10:06:42	9	testimony you give in this deposition will be the truth,
10:06:42	10	the whole truth, and nothing but the truth?
10:06:42	11	THE WITNESS: Yes.
10:06:42	12	
10:06:42	13	EXAMINATION
10:06:42	14	BY MR. BRANCART:
10:06:42	15	Q Good morning.
10:06:43	16	A Morning.
10:06:44	17	Q Would you please state your full name and
10:06:46	18	spell it.
10:06:47	19	A Yes. Bryan Dean Lewis. That's B-r-y-a-n;
10:06:50	20	Dean, D-e-a-n; Lewis, L-e-w-i-s.
10:06:55	21	Q Mr. Lewis, while you were employed by
10:06:58	22	Travelers, did you go by any other first names,
10:07:02	23	nicknames, or common names?
10:07:04	24	A No.
10:07:07	25	Q Would you state your current business address?

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13:34:16 1 testimony.

13:34:20 2 THE WITNESS: Yes.

13:34:21 3 BY MR. BRANCART:

13:34:21 4 Q Did you ever receive any direction from  
13:34:23 5 anybody at Travelers that there were other programs or  
13:34:26 6 types of housing that fit within the definition of  
13:34:30 7 either subsidized or government funded or public housing  
13:34:34 8 complexes in addition to or other than Section 8?

13:34:37 9 MR. ALEXANDER: Compound.

13:34:38 10 THE WITNESS: No.

13:34:47 11 BY MR. BRANCART:

13:34:47 12 Q Did you -- you -- at some point in time,  
13:34:57 13 you -- strike that.

13:35:01 14 While you were a Managing Underwriting  
13:35:08 15 Director, did you utilize the percentage criteria that  
13:35:15 16 you've identified in underwriting apartment complexes  
13:35:20 17 that had Section 8?

13:35:24 18 MR. ALEXANDER: Vague and ambiguous.

13:35:25 19 THE WITNESS: It would be a referral to me.  
13:35:28 20 We certainly wrote accounts with more than 25 percent.

13:35:32 21 MR. BRANCART: Okay.

13:35:35 22 Q While you were a MUD, a Managing Underwriting  
13:35:41 23 Director, did Account Executives have discretion to go  
13:35:46 24 up to 25 percent Section 8 within an apartment building  
13:35:52 25 and write an Apartment Pac policy?

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13:37:30 1 A Correct.

13:37:31 2 Q Under 25 percent, the operating rule within  
13:37:37 3 California was they could be written at the discretion  
13:37:41 4 of the Account Executive?

13:37:44 5 A Yeah.

13:37:45 6 MR. ALEXANDER: Vague as to time.

13:37:47 7 MR. BRANCART: Go ahead.

13:37:48 8 THE WITNESS: Yes.

13:37:49 9 BY MR. BRANCART:

13:37:49 10 Q Okay. The 25 percent -- I'm going to call it  
13:37:58 11 rule or guideline.

13:37:59 12 A Yeah.

13:37:59 13 Q We'll call it a guideline -- the 25 percent  
13:38:04 14 guideline. Was that -- as you described it, was that in  
13:38:06 15 place when you were a MUD?

13:38:09 16 A Yes.

13:38:10 17 Q Okay. Was that in place while you were a RUD?

13:38:15 18 A A RUD? Yes.

13:38:16 19 Q If the risk or the account exceeded 25 percent  
13:38:22 20 while you were a MUD, what was your understanding as to  
13:38:27 21 what was to happen? What was the Account Executive to  
13:38:31 22 do?

13:38:32 23 A In my role, they would just come into my  
13:38:35 24 office, and we'd look at the account. And, again, it  
13:38:38 25 was our way to monitor our growth. We experienced rapid

## WITNESS'S CERTIFICATE

I am the witness in the foregoing deposition. I have read the foregoing deposition, and having made such changes and corrections as I desire, I certify that the same is true of my own knowledge, except as to those matters which are therein stated upon my information or belief, and as to those matters, I believe it to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on \_\_\_\_\_,  
at \_\_\_\_\_.

\_\_\_\_\_  
BRYAN DEAN LEWIS

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1 STATE OF CALIFORNIA )  
2 COUNTY OF LOS ANGELES ) ss.  
3

4 I, BARBARA A. STAUFFER, CSR NO. 12282, in and  
5 for the State of California, do hereby certify:

6 That prior to being examined, the witness  
7 named in the foregoing deposition was by me duly sworn  
8 to testify the truth, the whole truth, and nothing but  
9 the truth;

10 That said deposition were taken down by me in  
11 shorthand at the time and place therein named and  
12 thereafter reduced to typewriting under my direction,  
13 and the same is a true, correct, and complete transcript  
14 of said proceedings;

15 That if the foregoing pertains to the original  
16 transcript of a deposition in a Federal Case, before  
17 completion of the proceedings, review of the transcript  
18 { } was { } was not required.

19 I further certify that I am not interested  
20 in the event of the action.

21 Witness my hand this \_\_\_\_ day of \_\_\_\_\_,  
22 2014.

23 \_\_\_\_\_  
24 Certified Shorthand Reporter  
25 for the State of California